COMPOST OPERATION STAKEHOLDER ADVISORY GROUP MEETING

DWM Building - Raleigh, NC

MEETING MINUTES

TUESDAY,	Taly	13,	2010
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Stacey Smith	RSG, consultants	John Risgaard	NCDQW	
Toe Hack	Mecklenburg County	Bill Lord	NCSU CES	
Tennifer Tones	NCDWQ	Bradley Bennett	DWQ	
Teryl Covington	NCSWANA.	David Halley	Facilitator	
Frank Franciosi	NCCC	Ken Pickle	DENR - DWQ	
Ed Mussier	DWM – Solid Waste	Doug Lassiter	NC Septic Tank Ass.	
Scott Carpenter	NCWWA-WEA	Bethany Georgoulizs	DENR - DWQ	
Scott Mouw	NCAPPEA	Sergei Chernikov	DENR - DWQ	
Billy Dunham	NC Dumper Group	Jason Watkins	DENR - DWM	
Craig Coker	NCCC/USCC	Liz Patterson	DENR - DWM	
David Goodrich	NCDWQ	Bob Rubin	NCSU	
Steve Cockman	McGill Env.	Michael Scott	DENR - DWM	
Allen Hardison	NCACC	Brian Rosa	DPPEA	

12:40 PM REVIEW OF LAST MEETING AND PREVIEW OF MEETING

The Steering committee – which includes Frank Franciosi, Ken Pickle, Scott Mouw, Bethany Georgoulias and Michael Scott have continued to meet regularly to put together_additional proposals for the group to work on. Currently they have created nineteen draft proposals. Six of those proposals (#6, #7, #16, #10, #11 and #12) were reviewed and approved by the Stakeholder Group at the June Stakeholder's meeting. Today we will present eight more draft proposals. We will again discuss each and then try to reach consensus on approving each one. The definition of consensus is "it is not the position I started with, but one I can support". Dave reintroduced the consensus card (green, yellow, and red card) technique and asked all the stake holders to use the card during the discussion to help the group reach consensus.

The Monitoring Subcommittee – which includes Joe Hack (chairman), Frank Franciosi, Craig Coker, Jeryl Covington, Steve Larson, Bob Rubin, Ken Pickle, and Ryan Smith have also been meeting to prepare an updated proposal for

monitoring parameters. They have not completed their draft proposal but plan to share what they are currently working on to get some feedback from the group. They plan to present their final draft at our August meeting.

We discussed that fact that not all the Stakeholders have attended the proposal meetings and the question was raised that we may not have full consensus if folks that did not attend the meeting did not get a chance to vote. The group felt that everyone received an advanced copy of the proposals and everyone that could not attend the meeting was given opportunity to send comments and suggestions prior to the meeting. Several Stakeholders that did not attend the June meeting sent in comments, concerns and suggestions at the last meeting. After discussion the group agreed (full consensus) that full consensus support for each proposal would be the same as receiving consensus from the entire group. Participants not able to attend meetings are encouraged to send David Halley any comments, concerns or suggestions for improvement (halleydave@aol.com)

1:20 PM REVIEW PROPOSALS

The following proposals were discussed and voted on (edits is contained in these minutes):

- 1. How to Treat New Composting Operation Facilities: #1
- 2. Phasing and Timing of Water Quality Permitting for Existing Facilities: #2
- 3. Permit Process Flow/Clarity of Administrative Duties: #3
- 4. Waste Water Management Options: #4
- 5. Non-Discharge Process Wastewater Mgt. Options that will be Permitted: #5
- 6. General Permit Options for Small Type 2 and Small Type 3 Facilities: #18
- 7. Options for Small Type 2 and Type 3 Fac. with Exposure but No Discharge: #15
- 8. Front End Practices To Reduce Volume: #15

Consensus was reached on each one except for #5 Non-Discharge Process Wastewater Management Options that will be permitted. The rest were approved with some minor changes to original draft proposal.

Proposed New Component (#1: Phasing and Timing of water quality permitting for How to treat new composting operation facilities?):

- For the purpose of identifying the timing and applicability of DWQ water quality permitting requirements, a <u>new facility</u> is a facility for which DWM or DWQ receives a complete composting operation permit application on or after January 1, 2011.
- All new facilities applying for a DWM or DWQ composting permit on or after January 1, 2011 must also apply for the appropriate DWQ water quality permit as per the revised DWQ permitting procedures established in 2010.
- DWM or DWQ shall make a specific written determination as to whether a new composting operation permit application is substantially complete, and whether a complete application has been received **before January 1, 2011**. If so, then:
- Complete new applications received before January 1, 2011 will be subject to the Session Law directive that, "New water quality permit applications filed after July 1, 2009 shall be handled on a case-by-case basis." In this circumstance DWQ will determine the appropriate water quality permitting requirements.
- **DWM** Demo Project permittees would be subject to meeting the new revised DWQ water quality permitting requirements following the expiration of their demo period (12 – 24 months).

Steering Committee Consensus: Yes

Notes:

The Session Law provides that NCDENR shall phase in the new permitting procedures in the period beginning on January 1, 2011 and ending October 1, 2012. This proposal applies the earliest Session Law date to new facilities. (Existing facilities are eligible for a delayed implementation schedule as per Proposal #2, following.)

Why we support this change:

- This proposal is one way to comply with the Session Law directive for new sites.
- It seems reasonable to achieve aquatic environmental protection at the earliest date possible for new facilities.
- With new requirements in place, it would encourage better initial site selection and procurement in order to meet new water quality requirements.

Stakeholder Advisory Group Consensus for #1: Phasing and Timing of water quality permitting for new composting operation facilities:

This proposal was accepted by all stakeholders present. Minor edits to title and text.

Proposed New Component (#2: Phasing and Timing of water quality permitting implementation for existing facilities):

- Existing facilities built and permitted prior to January 1, 2011, will be handled differently than new facilities. Existing facilities will have the deadlines listed below to submit substantially complete permit applications retrofit or provide an acceptable alternative for site water quality management under DWQ's revised permitting procedures and requirements
- By July 1, 2012, existing Large Type 3, and existing Type 4, and existing DWQ Residual Compost facilities must apply for the appropriate DWQ water quality permits as per the DWQ revised permitting procedures established in 2010, even though they may not be applying for renewal of DWM or DWQ composting permits. Individual stormwater and individual wastewater permits are anticipated for these facilities.
- By July 1, 2012 existing Large Type 1, existing Type 2, and small Type 3 facilities must apply for the appropriate DWQ water quality permits as per the DWQ revised permitting procedures established in 2010, even though they may not be applying for renewal of DWM permits. General Permit coverage is anticipated for these facilities.

Steering Committee Consensus: Yes

Notes:

- Older facilities were designed and built based solely on the Solid Waste Management section 1400 rules.
- Timing may be based on monetary constraints.
- Current knowledge of process water constituents was not available when these facilities were designed and built.
- Retrofitting these facilities with new BMP's will take time.
- Many of these facilities have both space and economic restraints.
- Monitoring requirements will be effective upon issuance of coverage under the water quality permit and will be in accordance with the specific facility type and permit.
- DWM and DWQ will notify affected facilities by letter in January 2011 and again in January 2012 of their water quality permitting obligations.

Why we support this new component:

- This approach acknowledges that existing facilities may need additional time to obtain proper DWQ permits, and to install appropriate water control measures. This seems to advance DWQ's water quality protection objectives, without unduly penalizing existing
- Gives older facilities more time to phase in to new requirements.
- This approach is responsive to space and cost issues.
- This schedule is consistent with the Session Law directive that, "Not later than January 1, 2011, the department shall begin the phase-in of the revised water quality permitting procedures for the composting industry Complete phase in...shall be accomplished not later than October 1, 2012." Setting a target date of 7/1/2012 provides some cushion for DWQ to meet the Session Law requirement of complete phase in by 10/1/2012.

- Delayed timing considers monetary constraints.
- Current knowledge of process water constituents was not available when these facilities were designed and built.

Stakeholder Advisory Group Consensus for #2: Phasing and Timing of water quality permitting implementation for existing facilities:

This proposal was accepted by all stakeholders present. Note deletions and insertions.

Proposed New Component (#3: Permit process flow/clarity of administrative duties): We propose that graphic representations (flow charts) of the permitting processes applicable to the composting industry be developed by NCDENR and made widely available to the industry.

Suggested elements of the flow charts may include the following:

- Identification of permit fees, and whether they are one-time, or yearly fees.
- Emphasis on the interactions between DWM and DWO that affect the other's permitting process.
- Nominal expected processing times for each DWM and DWQ unit, i.e. for each type of permit.
- Individual DWQ flow charts will be developed for each category of DWM and DWQ composting permits that have the same administrative procedures.
- Posting on both DWM and DWQ websites.
- Identification of DWQ contacts who can answer questions as to permitting within DWQ.
- Identification of the permitting obligations under each DWQ permit type.

Steering Committee Consensus: Yes

Notes:

- A final detailed process flow chart and clarification of administrative duties must necessarily follow the final determinations of the elements of the revised DWQ permitting process directed by Session Law 2009-322. Target for this work product would be within 60 days of the completion of the Stakeholder Process. some time on, or shortly before, the required phase in start date of 1/1/11.
- It's likely that as DWQ and DWM get more experience in working together, we may find ways to expedite the process.

Why we support this new component:

- All NCDENR divisions and staff owe the regulated community clear and expedited permitting procedures.
- Feedback from the regulated community has made it clear that we have not successfully communicated the elements of the permitting process.

Stakeholder Advisory Group Consensus for #3: Permit process flow/clarity of administrative duties:

This proposal was accepted by all stakeholders present. Note deletions and insertions.

Proposed New Component (#4: Wastewater Discharge Management Options):

The following will constitute acceptable and permittable management options for wastewater from compost facilities: that leave a permitted compost facilities that are discharged to waters of the state:

- a. Discharge to sanitary sewer
- b. Permitted process wastewater treatment Package plant

Steering Committee Consensus: Yes

Notes:

- The following methods may be used to avoid the discharge avoid the discharge of wastewater from a compost facility:
- Recycling of process waters on-site
 - o Land application on-site
 - o Cover over all operations
 - Pump and haul
- Specific determination of appropriate and acceptable methods will depend on facility and material characteristics, as well as DWQ's review of efficacy of the proposed methods.
- All of these methods are subject to compliance issues if there are permit limit violations, then corrective measures are required.

Why we support this new component:

• This change clarifies the acceptable methods for wastewater treatment and clarifies that these methods are applied to waters that leave a permitted compost facilities that are discharged to waters of the state.

Stakeholder Advisory Group Consensus for (#4: Wastewater Discharge Management Options:

 $\sqrt{}$ This proposal was accepted by all stakeholders present. Note deletions and insertions.

Proposed New Component (#5: Non-discharge process wastewater management options that will be permitted): **STEERING COMMITTEE REVISIT**

For facilities where the process water generated as part of the compost process cannot be contained and managed within the DWM permitted site, the water would be called process wastewater and the following DWQ permitting alternatives are available for the disposal or reuse of the wastewater via a non-discharge or land application system.

Steering Committee - Make Separate Proposal (Process water generated as part of the compost process that can be contained and managed within the DWM permitted site will not require a DWQ non-discharge permit, provided that DWM permit conditions include provisions on management of the process water to be protective of surface waters and groundwater quality. Management practices may include recycling of the process water back into the compost process.)

Offsite permitted systems:

Pump and Haul Systems under 15A NCAC 2T .0200

A Pump and Haul permit can be issued provided the facility has to have at least 24 hours worth of storage, based on up to a 25 year 24 hour storm event design, and must demonstrate that there is an agreement with a wastewater treatment facility to accept the waste. DWQ's regional offices issues and administer pump and haul permits.

Spray Irrigation Systems under 15A NCAC 2T .0500

These facilities spray or drip irrigate the wastewater onto approved areas or sites. There are a number of specified site investigation/permit application requirements for this disposal method that will likely result in minimum treatment requirements and specified limits for BOD, TSS, ammonia and fecal coliform.

High Rate Infiltration Systems under 15A NCAC 2T .0700

These facilities apply wastewater to approved areas at a rate exceeding 0.156 gpd/ft2 in Coastal Areas and at rates exceeding 1.5 gpd/ft2 in Non-Coastal Areas. This disposal method requires tertiary treatment and specified limits for BOD, TSS, ammonia, nitrate, and fecal coliform.

Reclaimed Water Systems under 15A NCAC 2T .0900

High-quality tertiary-treated wastewater that meets quality standards under .0906 is applied to approved areas, or furnished to distribution lines with certain restrictions on where and how it can be used. This disposal method has minimum treatment requirements and specified limits for BOD, TSS, ammonia, turbidity and fecal coliform.

Subsurface disposal? (Michael Scott investigating)

Steering Committee Consensus: Yes

- These options, with the exception of Pump and Haul Systems, will require treatment. The only exception is for Spray Irrigation Systems where it can be shown by calculation or modeling that groundwater impacts will not be realized at the Compliance Boundary of the facility.
- With the exception of Pump and Haul Systems, all industrial waste stream facilities that are to receive a Non-Discharge permit must undergo a hydrogeologic investigation as per .0504(e), .0704(e), and .0905(e). The hydrogeologic investigation and modeling must support that application rates and effluent concentrations will not result in contravention of groundwater standards.

- CARRY OVER THIS COMMENT TO NEW PROPOSAL: This component allows for the Department to regulate the compost process under a single permit issued by DWM, provided that the generated process water is managed on site. If the process water cannot be managed on site, then a DWQ permit is required for proper treatment and disposal of the wastewater.
- The non-discharge permitting options represent a number of choices that are alternatives to the traditional method of discharging to surface water. The type of Non-Discharge Permit that is best suited to a given facility will depend on the individual characteristics of the facility.

Stakeholder Advisory Group Consensus for ((#5: Non-discharge process wastewater management options that will be permitted:

 $\sqrt{}$ Not at this time. Stakeholders would like to revisit and examine this proposal again to look at possible new and creative methods of off-site subsurface disposal. Several volunteers agree to work with Steering Committee to look at this proposal again. Several Stakeholders would like group to investigate a possible rule change that would treat biosolid residuals not as wastewater (if they meet certain water quality standards) so that it could be spread offsite without expensive permitting procedures (hydrological studies). This may have to be in the form of a separate proposal.

Proposed New Component (#9: Individual Permits for DWM Large Type 3 & all Type 4 and DWQ Residual Compost Facilities):

Individual DWQ stormwater and wastewater permits will be issued for segregated flows/discharges at DWM Large Type 3, all Type 4, and DWQ Residual Compost Facilities. Non-segregated flows/discharges will be permitted under an individual DWQ wastewater permit.

Steering Committee Consensus: Yes

Notes:

- The NPDES permitting process requires an Engineering Alternatives Analysis (EAA) to demonstrate the only feasible and cost-effective option is a direct discharge of wastewater.
- The website link with the Engineering Alternatives Analysis (EAA) guidance is at: http://portal.ncdenr.org/web/wq/swp/ps/npdes/guidance).
- The cost for an individual permit is \$810-860 per year.
- No new discharges of oxygen-consuming waste are allowed to zero flow streams (0 7Q10 flow)
- Direct surface water discharges will be permitted via the NPDES program.

Why we support this new component:

- Circumstances and treatment/management options are very site-specific
- Process wastewaters will likely require wastewater treatment devices to meet discharge limits.
- Allows more flexibility to tailor permit to operation.

Stakeholder Advisory Group Consensus for (#9: Individual Permits for DWM Large Type 3 & all Type 4 and DWQ Residual Compost Facilities):

 $\sqrt{}$ This proposal was accepted by all stakeholders at the last meeting but there is a change in the proposal that the group had to agree on. The Steering Committee has recommended that Small Type 3 Facilities be allowed the option of a General Permit. The language of this proposal for Individual Permits was changed to reflect that change. The Stakeholder Group accepted this change.

Proposed New Component (#18: General Permit Option for Small Type 2 and Small Type 3 Facilities):

• Small Type 2 and Small Type 3 facilities that that hermit for Large Type 1 and Large Type 2 compost facilities that would be proposed and submitted for approval to EPA. Once approved, any Small Type 2 and Small Type 3 facilities that qualify would apply for the General Permit. This permit would cover both Stormwater and Wastewater discharge requirements.

Steering Committee Consensus: Yes

- Upon DWQ inspection of specific site conditions a facility that may be eligible for a General Permit may be required to obtain coverage under an Individual Permit.
- A General Permit is simpler than an individual permit but will still stipulate that facilities must follow stormwater/wastewater parameters.
- Provisions can be included into the General Permit for Large Type 1/Large Type 2 facilities that address Small Type 2 and Small Type 3 facilities, should DWQ determine different provisions apply to these smaller sites.
- Applicants must still address the specific circumstances of their facilities in regard to stormwater and wastewater issues in the permitting process.
- <u>DWQ will have a draft General Permit for EPA review by April 1, 2011.</u> Because a General Permit requires EPA approval, which may take up to a year, this General Permit may not become available for Small Type 2 and Small Type 3 Facilities until 2012.
- Small Type 2 and Small Type 3 facilities that do not qualify for No Exposure but do have a discharge would work under the current provisions of the Session Law on a case-by-case basis until the General Permit is available.
- <u>DWQ</u> Surface Water Protection Section and Aquifer Protection Section need to reconvene on the <u>protection of groundwater_issue_during development of the General Permit</u>
- The general permit will have the following elements:
 - o For stormwater discharges:
 - A written Stormwater Pollution Prevention Plan (would resemble DWM's O&M plan)
 - Quarterly sampling of stormwater
 - Required management response actions if sample results exceed benchmark values for the monitored parameters.
 - o For process wastewater discharges:
 - The application must establish that the discharge to surface waters is the best feasible alternative.
 - Quarterly monitoring of process wastewater discharges
 - The permit will require compliance with permit limits.

- Helps to streamline the process a general permit does not require a site-by-site public notice and establishes a pre-determined set of water management criteria to guide the design and siting process.
- Potentially less costly than individual permit at only \$100/yr.

Stakeholder Advisory Group Consensus for (#18: General Permit Option for Small Type 2 and Small Type 3 Facilities):

 $\sqrt{}$ This proposal was accepted by all stakeholders present. Note deletions and insertions.

Proposed New Component (#19: Option for Small Type 2 & Small Type 3 Facilities with **Exposure but No Discharge):**

The current permitting approach for Small Type 2 and 3 facilities utilized by DWM and DWQ includes the option of a No Exposure approval (See Proposal #11, Consensus achieved at June 2, 2010 Meeting). The majority of the Small Type 2 and 3 facilities are enclosed systems (Earthtub, or other in vessel system) or are located under a roofed structure. These two options (in vessel system or a roofed structure) prevent stormwater from coming into contact with the process. Feedstock storage areas and curing areas can then be roofed or covered with tarps to eliminate stormwater contact. Process water is managed within the process utilizing collection systems that reuse the material for moisture addition.

The proposed new component is to clearly articulate the requirements for Small Type 2 and 3 facilities that (1) do not meet No Exposure Requirements but that (2) do not have stormwater discharges:

- 1) NPDES stormwater permitting requirements apply to facilities with the **potential to** discharge to surface waters. An NPDES permit is not required for facilities without that potential to discharge. This concept is well established in DWQ's program and will apply to Small Type 2 and 3 facilities.
- 2) There is no set distance away from surface waters that determines whether or not a permit applies. As it does today, DWQ will take into account site-specific circumstances when evaluating whether a site has the potential to discharge to surface waters (regardless of whether those waters are inside or beyond the property boundary).

Steering Committee Consensus: Yes

Notes:

• Small Type 2 and Small Type 3 facilities that have exposure and a discharge will be eligible for a General Permit unless it is determined that an Individual Permit was necessary based on DWQ inspection.

Why we support this new component:

This component adds clarity to permitting requirements for Small Type 2 and Small Type 3 facilities that do not qualify for a No Exposure exclusion from permitting.

Stakeholder Advisory Group Consensus for (#19: Option for Small Type 2 & Small Type 3 **Facilities with Exposure but No Discharge):**

 $\sqrt{}$ This proposal was accepted by all stakeholders present.

Proposed New Component (#15: Education and Guidance on how to reduce volume): DWQ will establish baseline recommendations for compost facilities on how to eliminate the potential for process water discharges to the maximum extent possible (including segregation of stormwater flows). Similar requirements may be applied to some stormwater discharges. For example, BMPs that reduce volumes of stormwater discharges from areas with the highest potential for contamination may be required ahead of BMPs that simply treat those flows.

Steering Committee Consensus: Yes

Notes:

- This will be addressed to some degree in an Engineering Alternatives Analysis that will be required for an NPDES wastewater discharge permit.
- These baseline recommendations will be incorporated as a component of the training curriculum.

Why we support this new component:

- This principle is in harmony with an effort to optimize training and operation of composting facilities
- This principle helps protect water quality in North Carolina.

Stakeholder Advisory Group Consensus for (#15: Education and Guidance on how to reduce volume):

 $\sqrt{}$ This proposal was accepted by all stakeholders present.

The following is the current draft that the Monitoring Subcommittee is working on. It was shared with all the stakeholders. The group asked questions and discussed options. The Monitoring Subcommittee will continue work on proposal and be prepared to present at next meeting.

The Monitoring Subcommittee plans on meeting in Greensboro on August 3, 2010 from 10 am to 2 pm. Jeri is to find a suitable location to host meeting.

Here is the current proposal.

We propose the following new component to the Compost Permitting Process:

Proposed New Component (#8 Analytical Monitoring Requirements):

In consideration of multiple permitting levels of composting facilities and both the size and types of feedstock's incorporated into each, the monitoring required is different.

Testing Parameters: The matrix (next page) provides "triggers" for stormwater permit requirements.

Frequency: Initial monitoring shall be quarterly frequency of monitoring may be decreased to semi-annually (or less), based on one or a combination of the following:

- Four (4) consecutive monitoring events showing no exceedances of benchmark values
- Verifiable, documented implementation of a storm water pollution prevention plan
- Implementation of structural BMPs to minimize potential for off-site water quality impacts
- During the period of semi-annual monitoring any exceedances will revert back to quarterly monitoring schedule.
- The permittee petitions NCDENR for a lower frequency

The reduction in monitoring shall only be for the monitored constituents that are below bench mark value unless otherwise approved by NCDENR

Monitoring Committee Group Consensus: Not yet, work in progress.

- Considerations should be given to older existing facilities, it is understood that the Steering Committee is currently working on a proposal for older facilities. They are giving consideration to older facilities and giving them some time to comply with new monitoring parameters.;
- Considerations should be given to monitoring of metals associated with wastewater treatment or industrial process sludges at Type 4 facilities;
- Certain benchmark values should be determined based on TMDL's in a particular watershed:

- Quarterly monitoring was proposed consistent with existing stormwater permits;
- Will Stormwater BMP's assist in managing these constituents in the runoff;
- Considerations should be given to Fecal Coliform versus E Coli in the monitoring. The Steering Committee supports keeping Fecal Coli form, but with note in proposal that if EPA supports its use later on, that the DWQ would support switching to E. Coli as a pathogen indicator. (Ken Pickle Note: Whatever EPA may come up with, DWQ would be receptive to considering it. The permitting units would turn to the science units within DWQ, and accept their guidance on EPA's decision/determination. It's likely that we would allow the term of the new General Permit to expire, and then to revise it at the first five year renewal opportunity. Individual permits might be brought up to speed quicker because of our greater degree of administrative freedom with that type of permit. EPA may pick E. coli, or they might pick enterococcus, or they might stick with fecal coliform. We want to be responsive to the best science available, and accepted.)
- Type III facilities may accept manures in feedstock which may also trigger E Coli testing;
- Locate a rain gauge that posts data online, within a mile or so of a facility's site, instead of just a manual rain gauge. Data should be posted on 15-minute time increments or less. If there is not a gage close enough, the facility use tipping bucket rain gage and data logger. This would require the facility to download the data, and inspect and maintain the gage.
- The Committee is considering quantitative vs. qualitative monitoring as the primary means of monitoring, The Steering Committee supports the use of field parameter monitoring devices like DO meter, pH meter, conductivity meter, and NTU meter for rapid response management tools, but feel these parameters should not replace the primary quantitative monitoring protocols such as analyses for BOD, COD, nutrients, metals, etc. The Committee feels that a well run compost facility with a regular qualitative monitoring program is a good means of addressing issues of water quality. The Committee suggests that field monitoring devices, along with visual cues (e.g., color, odor, etc.), be voluntary and introduced in future training to help Compost Facilities address issues and perform better housekeeping in a timelier manner
- Bob is suggesting that the following equipment be used as in field monitoring devices to gain quantitative results-DO Meter, pH meter, conductivity meter, and NTU meter.
- Training needs to occur on these instruments along with in field visuals.
- Metals Type 4 facilities (Cu&Zn)

- Provides general layout to permittee of expectations during permitting and design;
- Provides "triggers" associated with either facility type and in certain feedstock cases;
- Introduces nutrient sensitive watersheds or impaired water issues;
- Having data on the storm distribution and time of sampling along with the total depth adds significant value without much extra cost. It could help explain unexpected lab results and also give an idea of what the antecedent conditions were. It would make a better data set for decision making down the road.

Note: Monitoring Matrix Goes Here

4:00 PMNEXT STEPS

At our next meeting we need to discuss the next set of compost permitting proposal and be prepared to develop consensus of the group: The next proposals we plan to try to cover, discuss and vote on are:

П	#8 Monitoring Parameters
	· · · · · · · · · · · · · · · · · · ·
	#13 Excluding Monitoring Requirements for Small Type 1 Facilities.
	#14Stormwater BMP's - Development of a list by DWQ that is "approved
	by the Stakeholders Group.
	#17 Training of Operators

Parking Lot Items:

- Steering Committee needs to look at notes for each proposal and make sure they
 relate and match up with proposal. Several proposals have gone through
 redrafts so they need to be reexamined to make sure they still relate.
- We need to investigate a rule change on treating residuals not as wastewater if they meet certain standards (with just biosolids – Class B)
- Under #5 we need to pull out the second paragraph and make it a separate proposal.
- We need to add DWQ Solid Waste Facilities to all our matrixes
- The question was raised about facilities under construction. We need to make sure we cover this.
- We need to develop a flow chart of the permitting process to make sure we have covered all the facilities. It would be nice to have a dichotomous key the shows what permits are needed based on facility type and discharge options.
 - *The drafts of those proposals start on next page. Any updates to these proposals will be sent out prior to the next meeting. Re-send out this proposals prior to next meeting.
 - * Meeting minutes from this meeting and documents to be posted on public side of NCDENR Portal

Next Meetings schedule: August 23 (August 25 is backup), 2010

12:30-4:30 PM

Meeting site has not yet been determined.

Minutes compiled and submitted by:

Scott Mouw, NCAPPEA Liz Patterson, DENR-DWM David Halley, True North Organizational Development Services

ADDENDUM

We propose the following new component to the Compost Permitting Process:

WORK IN PROGRESS (This to be discussed at August Meeting)

Proposed New Component (#13: Excluding Small Type 1 Facilities from Monitoring Requirements if operating in accordance with the 1400 rules):

We recommended that Small Type 1 Facilities that fall under the category of "notification sites" and are not required to have a DWM or DWQ permit for operation be excluded from monitoring requirements.

An MOU between DWM and DWQ on "notification sites monitoring" is recommended to help accomplish this new component to meet federal guidelines. The objectives of protecting public welfare and the environment can be accomplished without an individual permit or general stormwater permit by:

Small Type 1 notification facilities are limited to an area of 2 acres and a total processing quantity of 6,000 cubic yards. Given the vegetative nature of the composting feedstock's, the small footprint area, and the relatively small quantities of managed materials on-site, there is little potential for a significant runoff-induced pollution burden to arise from these small facilities, and little risk of violations of NC ambient water quality standards as a result of runoff from these sites."

Siting requirements of a Small Type 1 notification facility should limit the potential for the site to discharge to the surface waters of the state.

Specify that even though a DWQ permit may not be required the facility may still be subject to DWQ inspection.

Monitoring Committee Group Consensus: Not yet, work in progress.

- Notification of DWQ rules could be placed in the annual notification letter
- Facilities could be required to document BMP's in place to retain/detain water on the site

- Increased training will improve facilities management and increase awareness of proper compost management.
- Inspection criteria could be incorporated into the DWM procedures to address DWQ concerns.
- DWQ does not have the staff to permit the Small Type1 facilities

We propose the following new component to the Compost Permitting Process:

TO DISCUSS IN AUGUST

Proposed New Component (#14: DWQ will develop a list of "approved" Stormwater BMP's with the target completion date of January 1, 2011.):

This new component would provide a list of traditional and non-traditional stormwater Best Management Practices (BMP's) that could be used for Large Type 1, Type 2, Type 3, Type 4, and DWQ Residual Compost facilities.

Steering Committee Consensus: Yes

Notes:

- DWQ will utilize the CH2M Hill Study document as a resource.
- Explain the risk to human health and the environment.
- Provides a list of potential constituents found in process water by feedstock processed.
- Recommends BMP's, procedures, and structural controls to prevent adverse impacts to the waters of the state by managing quantity and quality.
- BMP's could be engineered and constructed systems or institutional, education or pollution prevention practices.
- BMP's are identified by purpose and effectiveness.
- BMP's will be ranked based on space efficiency, cost and level of complexity and number of benchmark constituents potentially controlled.
- A committee will be created to review and provide feedback on draft of BMP's guidelines created by DWQ.

Why we support this change:

- Helps facilities to reduce potential source volumes.
- Helps to improve "housekeeping" issues and operational practices.
- Provides a list of options for treatment by facility or feedstock type.
- Identifies space and cost issues.

TO DISCUSS IN AUGUST

Proposed New Component (#17: Training and Certification of Operators):

A new component would require training and certification of Compost Operators for DWM Large Type 1, Large Type 2, Type 3, Type 4 and DWQ residual compost facilities.

Steering Committee Consensus: Yes in concept, but still a work in progress as far as developing more details and specifics.

Notes:

- Industry is best qualified to do the training.
- A State agency or third party is best qualified for certification.

Why we support this change:

- Helps to reduce potential safety issues.
- Helps to improve "housekeeping" issues.
- Improves operations and efficiently.
- Helps to improve professionalism of industry and facility.
- Will teach and demonstrate water management practices.
- Will help track facilities and compost facility locations.
- Will help to improve product quality
- Creates a venue to discuss new changes to the compost permitting process.